

UNITED STATES DISTRICT COURT
District of Minnesota

19 & 20 DWF/LIB

UNITED STATES OF AMERICA,

INDICTMENT

Plaintiff,

18 U.S.C. § 1467

18 U.S.C. § 1470

v.

18 U.S.C. § 2251(a)

18 U.S.C. § 2251(e)

CHRIS MORALES,

18 U.S.C. § 2422(b)

18 U.S.C. § 2423(b)

Defendant.

18 U.S.C. § 2428

18 U.S.C. § 2253(a)

THE UNITED STATES GRAND JURY CHARGES THAT:

COUNT 1

(Transfer of Obscene Material to Minors)

On or about August 4, 2017, in the State and District of Minnesota and elsewhere,
the defendant,

CHRIS MORALES,

did, by means of interstate and foreign commerce, knowingly transfer obscene matters to
another individual, Minor A, who had not attained the age of 16 years, knowing that Minor
A had not attained the age of 16 years, all in violation of Title 18, United States Code,
Section 1470.

COUNT 2

(Coercion and Enticement)

On or about August 11, 2017, in the State and District of Minnesota and elsewhere,
the defendant,

CHRIS MORALES,

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used a facility and means of interstate and foreign commerce, to wit, the Internet, to knowingly persuade, induce, entice, and coerce Minor A, an individual who had not attained the age of 18 years, to engage in sexual activity for which the defendant, **CHRIS MORALES**, could be charged with a criminal offense, namely, production of child pornography, in violation of Title 18, United States Code, Sections 2251(a) and 2251(e), all violation of Title 18, United States Code, Section 2422(b).

COUNT 3

(Travel With Intent to Engage In Illicit Sexual Conduct)

Beginning on or about August 15, 2017 continuing through on or about August 31, 2017, in the State and District of Minnesota and elsewhere, the defendant,

CHRIS MORALES,

did travel in interstate commerce for the purpose of engaging in illicit sexual conduct, as defined in Title 18, United States Code, Section 2423(f), with Minor A, all in violation of Title 18, United States Code, Section 2423(b).

COUNT 4

(Production of Child Pornography)

On or about August 29, 2017, in the State and District of Minnesota, the defendant,

CHRIS MORALES,

did employ, use, persuade, induce, entice, and coerce a known minor, Minor A, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, where such depiction of such conduct was produced using materials that that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any

means, including by computer, all in violation of Title 18, United States Code, Sections 2251(a) and 2251(e).

COUNT 5

(Travel With Intent to Engage In Illicit Sexual Conduct)

Beginning on or about November 1, 2017, and continuing through on or about November 7, 2017, in the State and District of Minnesota and elsewhere, the defendant,

CHRIS MORALES,

did travel in interstate commerce for the purpose of engaging in an illicit sexual conduct, as defined in Title 18, United States Code, Sections 2423(f), all in violation of Title 18, United States Code, Section 2423(b).

FORFEITURE ALLEGATIONS

Counts 1-5 of this Indictment are hereby realleged and incorporated as if fully set forth herein by reference, for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Sections 1467, 2253, and 2428.

Upon conviction of any of the foregoing offenses, the defendant shall forfeit to the United States pursuant to Title 18, United States Code, Sections 1467, 2253, and/or 2428:

(1) any visual depiction described in section 2251, 2251A, 2252, 2252A, 2252B, or 2260 of this chapter, or any book, magazine, periodical, film, videotape, or other matter that contains any such visual depiction, which was produced, transported, mailed, shipped or received in violation of Chapter 110, United States Code;

(2) any obscene material produced, transported, mailed, shipped or received in violation of Chapter 71, United States Code;

(3) any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such offense(s); and

(4) any property, real or personal, used or intended to be used to commit or to promote the commission of such offense(s) or any property traceable to such property. The property subject to forfeiture includes, but is not limited to, one Lenovo laptop with power cord, serial number PFOESTLD; one Asus laptop with power cord, serial G5NOCX10U480209; and one Apple iPhone with IMEI number 359177077909540.

If any of the above-described forfeitable property is unavailable for forfeiture, the United States intends to seek the forfeiture of substitute property as provided for in Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 2253(b).

A TRUE BILL

United States Attorney

FOREPERSON